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8 **IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

9 Case No. 2:20-cv-00994

10 MINA DE ORO, LLC, a Nevada limited liability
company; THE TOY CHEST, LLC a Nevada
limited liability company,

11 Plaintiffs,

12 v.

13 MATTHEW BRENT GOETTSCHKE, an
14 individual, JOBEDIAH SINCLAIR WEEKS, an
individual, JOSEPH FRANK ABEL, an
15 individual, SILVIU CATALIN BALACI, an
individual, BITCLUB, an unknown entity, and
16 DOE and ROE Corporations,

17 Defendants.

**MOTION FOR ENTRY OF
CLERKS DEFAULT**

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19 Plaintiffs, MINA DE ORO, LLC, and THE TOY CHEST, LLC, (hereinafter "Plaintiffs"),
20 by and through their counsel, the Law Offices of P. Sterling Kerr, hereby move this Court for
21 entry of the default of Defendants MATTHEW BRENT GOETTSCHKE & JOSEPH FRANK
22 ABEL in this case.

23 It appearing from the files and records in the above-entitled action that Defendants,
24 JOSEPH FRANK ABEL being duly served on the 13th day of October 2020, and MATTHEW
25 BRENT GOETTSCHKE being duly served on the 6th day of November 2020 with the Summons,
26 and Complaint; that more than twenty-one (21) days, exclusive of the day of service, having
27 expired since service upon Defendants; and that no answer or other appearance having been filed
28 and no further time having been granted, the Default of Defendants for failing to answer or,

1 move, or otherwise plead within the time set forth in the summons is hereby entered. A copy of
2 the proposed Default is attached hereto as Exhibit A.

3 Dated this ____ day of January 2021.

4 DEBRA K. KEMPI, CLERK

5 By: _____
6 Deputy Clerk

7 Date: _____

8 Respectfully submitted,

9 LAW OFFICES OF P. STERLING KERR

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11 _____

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